

**U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY**

SYDNEY TYSON, M.D.,

Plaintiff(s),

v.

JOHN/JANE DOE 1 aka "PAUL
REED", COINBASE GLOBAL, INC.,
and JOHN/JANE DOES 2-10,

Defendant(s).

Civil Action No. 1:23-cv-22066

**DECLARATION OF JUSTIN A.
MEYERS, ESQ. IN SUPPORT OF
PLAINTIFF'S APPLICATION FOR
ALTERNATIVE SERVICE**

I, Justin A. Meyers, Esq., an attorney admitted to the practice of law before the courts of the State of New Jersey and not a party to the above captioned matter, certify as follows pursuant to Rule 11.2:

1. I am an attorney with the Law Offices of G. Martin Meyers, P.C., and counsel to the Plaintiff, Sydney Tyson, in the above captioned matter against the Defendants. I submit this certification in support of Plaintiff's application for leave to use alternative means to serve a copy of the summons and complaint on John (Jane) Doe Defendants 1-10.

2. Attached as Exhibit "A" hereto is a copy of a 7/8/24 Affidavit of Service on BAM Trading Services Inc. d/b/a Binance US, at 252 NW 29th Street Suite 905, Miami FL 33127.

3. Attached as Exhibit "B" hereto is a copy of a 6/28/24 Affidavit of Service on Cash App, at 195 Broadway Suite 600, Oakland CA 94612.

4. Attached as Exhibit "C" hereto is a copy of a 6/26/24 certification of Non-Service on Foris Dax Inc. d/b/a Crypto.com, at 10752 Deerwood Park Boulevard South, Waterview II Suite 100, Jacksonville FL 32256.

5. Attached as Exhibit “D” is a copy of a Coinfirm Report dated November 8, 2023.

6. The Court previously entered an Order permitting expedited service upon the various cryptocurrency exchanges hosting the online “wallets” where the Plaintiff’s cryptocurrency had been transferred. We have successfully served a copy of the Order on two (2) of the exchanges, Binance and Cash App (*see* Exhibits A and B, attached hereto), but they were not able to share any valuable information that would lead to the whereabouts or identity of these defendants. Our efforts to serve Crypto.com have thus far proven unavailing. (*See* Exhibit C, hereto attached).

7. I request that the Court grant leave to use alternative means of service on these John (Jane) Doe defendants pursuant to Fed. Rule Civ. Pro. 4(f)(3). Specifically, I intend to mint a non-fungible token (NFT) using my own Coinbase account which will contain a link to a webpage hosted on our law firm’s website, on which I will post a copy of the summons and complaint.

8. I will then “airdrop” the NFT from my Coinbase wallet to the destination addresses previously identified by our forensic expert, Coinfirm, as being affiliated with the John (Jane) Doe defendants who perpetrated the theft of Plaintiff’s cryptocurrency (*see* Exhibit D, hereto attached, at p. 7-9, “Assets Traced Identified on Cryptocurrency Services”, and p. 10-11, “Assets Traced Identified at Addresses with No Identified Owner”):

1A3VcxK9npSwBqQChhAZBFHnw9ofex4AG6
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bc1qa2qjyem499wq7emj8gkle9t56dmcgh4cfj8jw2
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3E2F6V4gxYsQ8bcGtSWL8T6GFwRn37xVmm

9. I make this certification under penalty of perjury. I am aware that if any of the above statements are false, I am subject to punishment.

Dated: Sept. 26, 2024

By: /s/ Justin Meyers
Justin Meyers

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